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November 8, 2018

Via ECF and Facsimile

Honorable George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 1007

RE: Christine McGrath Kamrass v. Jefferies, LLC, et al.
United States District Court, Southern District of New York Case No. 1:17-cv-
07465
(Joint Motion to Continue December 12, 2018 Pre-trial Conference)

Dear Judge Daniels:

Plaintiff, Christine McGrath Kamrass, and Defendants Jefferies LLC, Jefferies & Company, Inc., and John Laub, hereby jointly move this Court to continue the pre-trial conference currently set for December 12, 2018 at 9:45 am. As grounds for the requested continuance, the parties state that they have completed substantial paper discovery, including discovery of electronically stored information, and have begun taking depositions. For several reasons, including, the number and location of witnesses, including third party witnesses, and counsel, travel necessitated by the location of various witnesses, and the busy calendars of the various counsel and witnesses, the parties anticipate continuing to work towards the remaining discovery into early 2019. With additional discovery to be completed and no substantive issues to address to the Court, the parties do not feel the need to conduct a pre-trial with the Court at this time.

Accordingly, the parties jointly request that the pretrial scheduled for December 12, 2018 be continued for approximately sixty days, or until February 13, 2019. At that time, the parties anticipate that they will be in a position to discuss the progress of discovery, discovery that may remain to be completed, any discovery issues that have arisen between the parties, and further case deadlines, including dispositive motion practice, expert deadlines and trial dates.

The undersigned counsel have met and conferred regarding this matter and jointly submit this motion in good faith and not for purposes of delay.

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Respectfully submitted,

/s/ Daniel M. Connell
Haber Polk Kabat, LLP

Counsel for Plaintiff
Christine McGrath Kamrass

/s/ Bruce G. Hearey (per consent)
Ogletree, Deakins Nash, Smoak &
Stewart, P.C.

Counsel for Defendants
Jefferies LLC, Jefferies & Company, Inc.
and John Laub

cc via ECF: All Counsel of Record